

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

MARK FLORA

VS.

TRANSOCEAN DRILLING
(USA), INC., ET AL.

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C.A. NO. 4:19-CV-2328

DEFENDANTS' FINAL TRIAL PLAN

COMES NOW, Defendants Gulf Logistics Operating, Inc., Gulf Logistics, LLC, LLOG Exploration Offshore, LLC and Grand Isle Shipyard, LLC, who file this Final Trial Plan pursuant to and in compliance with the Court's Trial Scheduling Order (Doc. 95) indicating (1) the time allocation for direct and redirect examination of each witness Defendants intend to call, (2) the time allocation for cross-examination of each of the opponents listed witnesses, (3) the remaining time necessary to present each party side of the case, and (4) the total time estimate for all hearing matters necessary to present each party's case.

A. Defendants' Witnesses:

Based on the Court's Order and the Plaintiff's Initial Trial Plan, Defendants intend to call the following witnesses in this proposed order and within the following estimated times for their direct examinations and redirect examinations in the Defendants' case in chief:

1. Capt. Ron Campana **direct (60 minutes) re-direct (20 minutes)**
2. George Platt MD **direct (45 minutes)re-direct (10 minutes)**
3. Brian Parker NP **direct (45 minutes)re-direct (15 minutes)**
4. David Bourg NP **direct (60 minutes)re-direct (20 minutes)**
5. Taylor Brown MD **direct (90 minutes)re-direct (15 minutes)**
6. Capt. David Scruton **direct (90 minutes) re-direct (20 minutes)**

B. Plaintiff's Witnesses:

Based on the Plaintiff's Initial Trial Plan, several of the Defendants' witnesses were listed on the Plaintiff's witness list. Accordingly, Defendants estimate it will need the following time for cross-examination/direct examination of Plaintiff's witnesses during the Plaintiff's case in chief:

7. Ralph Lagarde **direct (60 minutes) re-direct (30 minutes)**
8. James Bassi **direct (45 minutes) re-direct (20 minutes)**
9. Duroc Schexnaydre **direct (60 minutes) re-direct (20 minutes)**
- 10.Scott Sepulvado **direct (60 minutes) re-direct (30 minutes)**
- 11.Capt. Lester James **direct (60 minutes) re-direct (30 minutes)**
- 12.Randy Whitaker **direct (45 minutes) re-direct (20 minutes)**
- 13.Eric Callais **direct (45 minutes) re-direct (15 minutes)**
- 14.Michael Lebsack **Cross (90 minutes.) re-cross (20 minutes.)**
- 15.Capt. Mark Flora: **Cross- (90 minutes) re-cross (25 min.)**

16. Gregory Harvey MD Cross (45 minutes) re-cross (30 minutes.)

17. Michael Roberts DC Cross (90 minutes) re-cross (30 minutes)

18. Andrew Lee MD Cross (45 minutes.) re-cross (15 minutes)

C. Remaining Time Necessary to Present Defendants' Case

Based on the above, it is estimated that the Defendants may need an additional four hours for opening and closing statements and other unplanned time necessary to present Defendants' case.

D. Total Time Estimate for all Hearing Matters for Defendants' Case

Excluding voir dire, Defendants estimate three hours for motions, jury charge conference, unplanned matters.

Total Direct Examination: 765 minutes or 12 hours and 45 minutes

Total Redirect Examination: 265 minutes or 4 hours, 25 minutes

Total Cross Examination: 360 minutes or 6 hours

Total Re-Cross Examination: 120 minutes or 2 hours

Total Remaining time 4 hours

Total Hearing Time 3 hours

TOTAL TIME 32 HOURS 10 minutes

Respectfully submitted:

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*Attorneys for Defendant,
Grand Isle Shipyard, LLC*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and foregoing instrument has this day been served on all parties through the Court's electronic filing system and as noted below in accordance with the Federal Rules of Civil Procedure:

☐ Hand Delivery ☐ Prepaid U.S. Mail ☐ U.S. Mail/CMRRR
☒ Email ☐ Facsimile ☐ Overnight Mail Service

Lafayette, Louisiana, this 14th day of July 2022.

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ALAN J. MECHE (SBOT#24025530)